

**FEMA**

July 19, 2024

Neil Thompson
NYC Office of Management and Budget
255 Greenwich Street Floor 8
New York, New York 10007

Dear Mr. Thompson,

Thank you for your participation in the FY 2023 Shelter and Services Program (SSP). The Federal Emergency Management Agency (FEMA), National Programs Directorate (NPD), and U.S. Customs and Border Protection (CBP) monitor recipients to ensure that project goals, objectives, performance requirements, budgets and other related grant requirements are met. At the same time, monitoring provides an opportunity for training and technical assistance to support recipients. In accordance with the Code of Federal Regulations, Office of Management and Budget Circulars and program guidance, FEMA and CBP will conduct a site visit review of the following award:

Award Number	Program Name	Award Amount
EMW-2023-SP-05027	Shelter and Services Program	\$106,879,743.00

The monitoring will consist of a joint financial and programmatic site visit. Recommended participants for the site visit include the SSP points of contact at your organization and any staff who are involved in your grant administration and/or implementation. After the site visit is complete, you will receive a letter formally advising you of the results, including any items needed for compliance.

Your site visit is scheduled to take place on August 20, 2024. Please respond to this email with your availability to meet virtually with DHS for 30 minutes on July 22nd, 23rd, or 24th. This meeting will discuss key site visit logistics and other planning considerations. Upon receipt of your availability, FEMA will send a meeting invitation.

Appendix A includes a list of required programmatic and financial documents that must be submitted before the site visit. The requested documentation should be sent to fema-ssp@fema.dhs.gov by PDF attachment no later than **August 6, 2024**. Please let us know as soon as possible if you cannot provide the requested documents by the due date.

We look forward to working with you and your team. If you have any questions or concerns regarding this site visit, please contact Danielle Smith at danielle.smith@associates.fema.dhs.gov or at fema-ssp@fema.dhs.gov.

Sincerely,

Betsy Hernandez

Shelter and Services Branch Chief

Site Visit Preparation - Appendix A

In preparation for the programmatic monitoring portion of the site visit, we will need certain information, documentation, and policies and procedures from your organization. Although the requested information may initially appear overwhelming, much of it may already exist within your organizational documents.

Please submit the following information to FEMA via email as soon as possible, but no later than August 6, 2024.

1. Administration
 - a. For your organization, site, or division, please provide the following:
 - i. Organizational chart.
 - ii. List of key responsibilities for all personnel in charge of administering your SSP grant.
 - iii. Employee ethical standards of conduct documentation.
 - iv. Organizational hiring and background check policy.
 - v. If using SSP funds for Management and Administration (M&A) expenses, provide a copy of your procedures or processes for ensuring that all M&A hours charged to your SSP award accurately represent the activities performed.
 - vi. Service staff operating policies and procedures.
2. Statutory and National Policy Requirements
 - a. Submit a copy of your organization's records retention policy or proof of following records retentions procedures. Provide retention period standards for financial reports, supporting documentation, and other award- related records, including a retention schedule, if available.
 - b. If using SSP funds for renovations/modifications, submit proof of compliance with Environmental and Historic Preservation requirements.
 - c. Provide any documentation of your organization's Civil Rights Policy.
3. Subrecipients and Subaward Monitoring
 - a. If you provide SSP funding to any subrecipients, please submit the following:
 - i. List of all subrecipients.
 - ii. Copies of your subaward agreements.
 - iii. Supporting documentation verifying the nonprofit status of all subrecipients.
 - iv. A copy of your subrecipient monitoring plan and progress monitoring tools.
 - v. Any evidence of your subrecipient monitoring activities.
 - b. Provide any policies/procedures on subrecipient or subcontractors that answer the following:
 - i. What percentage of FEMA dollars are awarded to minority, women-owned, and labor surplus area businesses?
 - ii. How is the subrecipient/subcontractor plan implemented to ensure compliance?
4. Progress Reporting
 - a. Provide a sample of your performance measure supporting documentation for each activity category in your SSP budget (i.e., number of meals served, number of transports provided, number of hotel night stays, etc.).

- b. Provide recently prepared (i.e., printed within 10 days of this request) project cost/general ledger(s) for all FEMA grants – to support FFR/FSR reconciliation referenced below.
 - c. Provide a reconciliation of quarterly net disbursements reported on the FFR/FSR to quarterly expenditures in accounting records (general ledger) for all FEMA grants?
- 5. Property and Equipment Standards
 - a. Submit records for any SSP-funded equipment purchases valued at \$5,000 or more per unit.
 - b. If purchasing equipment with your SSP grant, provide a copy of your organization's policy dictating the use, transfer, and disposal of federally-funded equipment and supplies, including insurance where applicable.
- 6. Procurement and Contracts
 - a. Provide the most recent copy of your organization's written procurement and purchasing policy.
 - b. If your organization executed any contracts with your SSP funding, please submit the following:
 - i. RFPs and other documentation to show compliance with federal, state, or local procurement policies.
 - ii. Copies of received bids/quotes.
 - iii. Copies of executed contract(s)/purchase order and statements of work.
- 7. SSP – Programmatic
 - a. Submit a copy of your organization's policies or procedures used to ensure the secure collection and submission of A-Numbers and any other personally identifiable information (PII).
 - b. If using SSP funds for shelter-to-shelter transportation or interstate bus chartering, provide written documentation or other proof to demonstrate coordination, communication, or affirmative confirmation with a receiving jurisdiction or organization.
 - c. If using SSP funds for group transportation (i.e., buses), please provide evidence of the processes used by your organization to ensure buses operate at a minimum of 75% capacity.
 - d. If using SSP funds for renovations or modifications to rented real property, please provide a copy of the rental agreement addressing space, any limitations of use, and the rental period.
 - e. Submit all standards/procedures on determining the reasonableness, allocability, and allowability of costs charged to federally-funded projects that answer the following:
 - i. Who is responsible for verifying/determining that costs are reasonable, allocable, and allowable before the expense is incurred?
 - ii. How are unallowable costs identified?
 - iii. Is there a list of unallowable costs that a project manager could reference?
 - f. Provide evidence of your supporting documentation standards for transactions recorded in your organization's accounting system (i.e., which documents have to be included with transaction requests) including, but not limited to, check requests, purchase orders, expense reimbursement requests, credit card purchases, and journal vouchers?
- 8. SSP – Financial Administration

- a. Provide audited financial statements and/or OMB Circular A-133 audit reports for the past three years.
- b. Provide previous fiscal year revenue broken down between federal vs. non-federal sources (if this information is not available from the audited financial statements, please include supporting documentation, such as general ledger reports).
- c. Provide a general ledger chart of accounts/expense code list and date of last update.
- d. Provide accounting manual and date of last update.
- e. Provide policies/procedures on delegation of authority that illustrate the following:
 - i. Who has final authority to approve proposals?
 - ii. Who formally accepts (signs) awards and subsequent amendments?
- f. Provide policies/procedures that describe the sponsored project budget revision/amendment process, specifically:
 - i. How does the organization transfer funds between project budget categories?
 - ii. What is the procedure if the revision requires prior sponsoring agency approval?
 - iii. Are re-budgeting requests prepared in writing?
 - iv. After completing the re-budgeting process, are project budgets revised in the financial system? Are re-budgeting requests reviewed for compliance with Federal regulations?
- g. Provide policies/procedures on grant-funded project budget and expenditure monitoring that answer the following:
 - i. Does the organization regularly track progress toward approved project budgets? How often?
 - ii. Who is responsible for monitoring costs charged to project accounts?
 - iii. What internal controls are in place to preclude incurring obligations in excess of total funds available for the award?
 - iv. How are cost overruns treated?
- h. Provide policies/procedures on cost transfers/expenditure reclassifications between projects and awards that answer the following:
 - i. Who initiates cost transfers? Who approves cost transfers?
 - ii. What supporting documentation and justification is required to process a cost transfer?
 - iii. What is the timeframe for identifying and correcting an error?
- i. Provide policies/procedures on expenditure approval that answer the following:
 - i. Who reviews award-related expenditure requests for compliance with OMB cost principles?
 - ii. Who approves expenditures? Are there any dollar thresholds for which additional approval is required?
 - iii. Are there bid/quotation thresholds for higher value expenditures?